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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA

1:23-cr-00254-MC

v.

NEGASI ISHAIAH ZUBERI, aka
JUSTIN JOSHUA HYCHE,

**GOVERNMENT'S SECOND
AMENDED PROPOSED VERDICT
FORM**

Defendant.

Upon further review of relevant case law, the government proposes the attached second amended verdict form that asks the jury to make factual findings about the locations from which the firearms and ammunition charged in each count were recovered.

Dated: October 17, 2024

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Suzanne Miles
SUZANNE MILES
Assistant United States Attorney

Government's Second Amended Proposed Verdict Form

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA

1:23-cr-00254-MC

v.

VERDICT

**NEGASI ISHAIAH ZUBERI, aka
JUSTIN JOSHUA HYCHE**

We, the jury, being duly empaneled and sworn, hereby unanimously find **NEGASI ISHAIAH ZUBERI, aka JUSTIN JOSHUA HYCHE**, as follows:

Count 1
Kidnapping

Not Guilty

Guilty

If you checked “Guilty”, you must choose at least one of the following to explain which type(s) of conduct your verdict is based on:

(Please check all that apply)

Defendant transported AV1 across state lines from Washington to Oregon

Defendant traveled in interstate commerce in committing, or in furtherance of, the offense

Defendant used any means, facility, or instrumentality of interstate commerce in committing or furtherance of the offense

Count 2
Transportation for Criminal Sexual Activity

Not Guilty

Guilty

Count 3
Kidnapping

Not Guilty

Guilty

Count 4
Felon in Possession of a Firearm and Ammunition

Not Guilty

Guilty

If you checked “Guilty”: Do you find that the firearm and/or round[s] of ammunition was/were recovered from AV1:

No

Yes

Count 5
Felon in Possession of a Firearm and Ammunition

Not Guilty

Guilty

If you checked “Guilty”: Do you find that the firearm[s] and/or round[s] of ammunition was/were recovered from the Prowler trailer:

No

Yes

Count 6
Felon in Possession of Ammunition

Not Guilty

Guilty

If you checked “Guilty”: Do you find that the round[s] of ammunition was/were recovered from a bedroom in the 1336 North Eldorado Avenue home:

No

Yes

Count 7
Felon in Possession of Ammunition

Not Guilty

Guilty

If you checked “Guilty”: Do you find that the round[s] of ammunition was/were recovered from a garage in the 1336 North Eldorado Avenue home:

No

Yes

Dated: October _____, 2024

PRESIDING JUROR